

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

In Re:)	Case Number 21-02909-HB
The Muffin Mam, Inc.)	
EIN xx-xxx-9843)	Chapter 7
Debtor.)	

**APPLICATION FOR APPROVAL OF CONTINGENT FEE EMPLOYMENT OF
SPECIAL COUNSEL FOR THE TRUSTEE**

The Trustee in the above-captioned case, John K. Fort, requests that the Court authorize him to employ Smith Hudson Law, LLC as Special Counsel for the Trustee. 11 U.S.C § 327(a).

The Trustee wishes to employ Smith Hudson Law, LLC, attorneys duly admitted to practice in this Court, to represent him in this case. The employment of Smith Hudson Law, LLC is necessary and the professional services to be rendered to the Trustee by Smith Hudson Law, LLC will include without limitation: assessing, pursuing and litigating recovery of assets pursuant to 11 U.S.C. §§ 544 through 550; and performing such other legal services for and on behalf of the Trustee as may be necessary or appropriate in the administration of the case.

Employment of Smith Hudson Law, LLC in this case to represent the Trustee is in the best interest of the estate because Smith Hudson Law, LLC has extensive experience in litigation, including without limitation business and bankruptcy litigation, bankruptcy proceedings, and liquidations of bankruptcy estates. Further, Smith Hudson Law, LLC has represented the Trustee in other cases as Special Counsel.

Page Two

APPLICATION FOR APPROVAL OF CONTINGENT FEE EMPLOYMENT OF SPECIAL COUNSEL
21-02909-HB

The Trustee and Smith Hudson Law, LLC have agreed that Smith Hudson Law, LLC will be employed on a contingency basis plus costs. Smith Hudson Law, LLC will be paid 33.33% of all recoveries plus costs and expenses. Smith Hudson Law, LLC will front the costs and expenses. The Trustee and Smith Hudson Law, LLC understand that Smith Hudson Law, LLC's compensation will be set by the Court pursuant to 11 U.S.C. §330(a) and that the amount of compensation set by the Court may differ from that agreed to between them. The Trustee and Smith Hudson Law, LLC understand that in no event will the compensation, plus costs and expenses, exceed the gross amount that Smith Hudson Law, LLC recovers for the Estate.

The Trustee believes, to the best of his knowledge and information, that Smith Hudson Law, LLC are disinterested persons as that term is defined by 11 U.S.C. § 101(14) and that Smith Hudson Law, LLC does not hold or represent an interest adverse to the Estate.

Smith Hudson Law, LLC has no connections with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee. Smith Hudson Law, LLC has represented the Trustee in other cases unrelated to the present case.

The Trustee requests that the Court consider his application and authorize the appointment of Smith Hudson Law, LLC as Special Counsel for the Trustee.

Dated: September 10, 2021

/s/John K. Fort

John K. Fort, Chapter 7 Trustee
P. O. Box 789, Drayton, SC 29333
johnkfort@gmail.com